

Attachment G-2

ATTACHMENT G-2 – DEFENDANT’S PROPOSED EXHIBITS

Exhibit Number	Description
1	Hugh Jacobs LinkedIn Profile - Hugh Jacobs Dep. Ex. 1
2	TPI Property Management Mission Overview and Capabilities - Hugh Jacobs Dep. Ex. 2
3	Seven Courts Apartments Webpage - Hugh Jacobs Dep. Ex. 3
4	Washington Post Article - Hugh Jacobs Dep. Ex. 4
5	Management Agreement - Hugh Jacobs Dep. Ex. 5
6	Assignment and Assumption Agreement - Hugh Jacobs Dep. Ex. 6
7	Ownership Organizational Structure - Hugh Jacobs Dep. Ex. 7
8	Financial Statements and Independent Auditor's Report - Hugh Jacobs Dep. Ex. 8
9	Form 990: Return of Organization Exempt from Income Tax - Hugh Jacobs Dep. Ex. 9
10	Emails with Latoya Wynn - Hugh Jacobs Dep. Ex. 10
11	Emails with Bonnie Gayner and Marco Capraro and Norma Padilla; APD notification - Hugh Jacobs Dep. Ex. 11
12	Email from Amara Hubbard to Toya Wynn - Hugh Jacobs Dep. Ex. 12
13	Emails with Rafael Lenz; Jamie Williamson; Bonnie Gayner; Rodrick Harris - Hugh Jacobs Dep. Ex. 13
14	Email - Hugh Jacobs Dep. Ex. 14
15	Email containing Financials for August 2021 - Hugh Jacobs Dep. Ex. 15
16	Texts from Horace/Holt Security with images of Seven Courts - Hugh Jacobs Dep. Ex. 16
17	Emails between Erik Zamora & Rodrick Harris & Jamie Williamson about cash availability to pay Holt Security - Hugh Jacobs Dep. Ex. 17
18	Texts from Horace/ Holt Security - Hugh Jacobs Dep. Ex. 18
19	Double Shooting Incident Report 04/06/19 - R. Harris Dep. Ex. 1
20	Email 04.22.2019 - R. Harris Dep. Ex. 2
21	Holt Security, LLC Services Agreement dated 05/13/2019 - R. Harris Dep. Ex. 3

22	Emails with Crime Prevention Plan Doc - R. Harris Dep. Ex. 4
23	Email from Holt 06/19/2019 - R. Harris Dep. Ex. 5
24	Email from Holt 07/19/2019 - R. Harris Dep. Ex. 6
25	APD Offense Report 10/17/2019 - R. Harris Dep. Ex. 7
26	Email from Holt detailing drug dealing report and invoice 12/31/2019 - R. Harris Dep. Ex. 8
27	Emails with Holt about lease violation for illegal activities for drugs - R. Harris Dep. Ex. 9
28	Emails with Holt about unit issue 03/10/2020 - R. Harris Dep. Ex. 10
29	Emails with Holt about Toya involvement in drug activity 03/15/2020 - R. Harris Dep. Ex. 11
30	Emails with Bonnie Gayner, Horace Holt and Rodrick Harris dated 03/31/2020 - R. Harris Dep. Ex. 12
31	Email from Holt; Duty Report 04/14/2020 - R. Harris Dep. Ex. 13
32	Email from Holt; Report 04/13/2020 about Toya's daughter - R. Harris Dep. Ex. 14
33	Email response from Harris to Holt regarding Report 04/13/2020 about Toya's daughter - R. Harris Dep. Ex. 15
34	Email from H. Holt about illegal activity during overnight hours dated 05/20/2020 - R. Harris Dep. Ex. 16
35	Email from B. Gayner re: Invoice Holt Security - R. Harris Dep. Ex. 17
36	Email from Holt; Re: Report from 05/29/2020 - R. Harris Dep. Ex. 18
37	Email from B. Gayner re: H. Holt meeting with R. Harris and T. Wynn 06/01/2020 - R. Harris Dep. Ex. 19
38	Email from H. Holt; Re: Report from 06/06/2020 - R. Harris Dep. Ex. 20
39	Email from Holt; Re: Report from 06/80/2020 - R. Harris Dep. Ex. 21
40	Email from Holt with overnight/early morning incidences list - R. Harris Dep. Ex. 22
41	06/22/2020 Email from Toya with 12-month period APD log - R. Harris Dep. Ex. 23 TPI001083, TPI001085
42	Email from Holt about Toya's sister reporting party - R. Harris Dep. Ex. 24 TPI003939

43	07/02/2020 Email from Holt report from 7/14/20 - R. Harris Dep. Ex. 25
44	Email from Holt reporting and requesting more officers on 07/18/2020 - R. Harris Dep. Ex. 26
45	APD Incident Report 07/25/2020 - R. Harris Dep. Ex. 27
46	Email from Holt; Re: Report from 07/25/2020 - R. Harris Dep. Ex. 28
47	Email from Holt Re: Incident Report 07/26/2020 - R. Harris Dep. Ex. 29
48	Email from Holt Re: Report 07/28/2020 - R. Harris Dep. Ex. 30
49	Emailing containing new contract; Holt Security, LLC Services Agreement dated 07/28/2020 - R. Harris Dep. Ex. 31
50	Email from Holt Re: Report from 8/3/20 - R. Harris Dep. Ex. 32
51	Email from Holt requesting more officers following car break in attempts - R. Harris Dep. Ex. 33
52	Email from Holt follow up from 8/3/20 - R. Harris Dep. Ex. 34
53	Email from Holt 8/4/20 requesting extended hours - R. Harris Dep. Ex. 35
54	Email from Holt listing units with illegal activities - R. Harris Dep. Ex. 36
55	Email from Holt Re: Report from 8/11/20 - R. Harris Dep. Ex. 37
56	Email from Holt includes that seven court is behind 3 payments - R. Harris Dep. Ex. 38 TPI003361
57	APD Incident Report 10/13/20 - R. Harris Dep. Ex. 39
58	Email containing Holt Termination Notice - R. Harris Dep. Ex. 40
59	Email containing Hickey Security Contract - R. Harris Dep. Ex. 41
60	Email with Hickey Criminal Trespass Warning 11/05/20 - R. Harris Dep. Ex. 42
61	Email containing Property Incident Report 11/12/20 - R. Harris Dep. Ex. 43
62	Email from Hickey asking to change Saturday schedule to 7pm to 3am - R. Harris Dep. Ex. 44
63	Email with MTW Data Benchmarks - R. Harris Dep. Ex. 45
64	Email to Toya from resident; complaint about threats - R. Harris Dep. Ex. 46

65	Email from Holt to Harris 01/19/21 - R. Harris Dep. Ex. 47 TPI002838
66	Email from Hickey; Contractual Agreement Termination signed 03/01/21 - R. Harris Dep. Ex. 48
67	3/23/2021 Email from EyeQ Monitoring with Quote - R. Harris Dep. Ex. 49
68	4/14/2021 Email from EyeQ Monitoring with Quote - R. Harris Dep. Ex. 50
69	Emails between Block Firm and Jeff to schedule Diaz family depositions; Jeff requesting to push back a week 5/16/22 - R. Harris Dep. Ex. 51
70	Texts from Horace/ Holt Security with images - R. Harris Dep. Ex. 52
71	Email containing Property Incident Report 07/21/21 - R. Harris Dep. Ex. 53
72	Civil Cover Sheet; Diaz Family's Complaint - R. Harris Dep. Ex. 54
73	Email containing B23 Edwin Medrano Statement and Lease - R. Harris Dep. Ex. 55
74	Email containing APD Summary Incident Report 09/15/21; Holt reports fraud by Toya - R. Harris Dep. Ex. 56
75	Email with Google Voice voicemail from Detective Jackson APD 10/15/21 - R. Harris Dep. Ex. 57
76	Emails to Barbara; majority redacted; resident reports threats and move out plan - R. Harris Dep. Ex. 58
77	Email with F-ISI Security Patrol Proposal - K. Hickey Dep. Ex. 1
78	Email from Toya with Security Contract - K. Hickey Dep. Ex. 2
79	H.S.I. Daily Log 11/04/20 - K. Hickey Dep. Ex. 3
80	Hickey Security and Investigation Incident Report 11/05/20 - K. Hickey Dep. Ex. 4
81	Emails with Toya about hours change to 7pm – 3am - K. Hickey Dep. Ex. 5
82	Email with Patrol Schedule for January 2021 - K. Hickey Dep. Ex. 6
83	Email referencing reports from 12/14/2020 to 12/17/2020 - K. Hickey Dep. Ex. 7
84	H.S.I. Daily Logs Jan-March 2021 - K. Hickey Dep. Ex. 8

85	Email from Maggie Fontaine asking Hickey with weekly Community crime map - K. Hickey Dep. Ex. 9
86	Email with Seven Courts Apartments Termination Letter 03/01/2021 - K. Hickey Dep. Ex. 10
87	Hickey Security and Investigation Incident Report 03/30/2021 - K. Hickey Dep. Ex. 11
88	Email containing Security Management Proposal to Seven Courts 04/12/21 - K. Hickey Dep. Ex. 12
89	Emails containing invoices from 05/24/21 - K. Hickey Dep. Ex. 13
90	Emails between Block Firm & Hickey 11/23/21 - K. Hickey Dep. Ex. 14
91	Emails between Block Firm & Hickey late December 2021 – early January 2022 - K. Hickey Dep. Ex. 15
92	Emails between Block Firm & Hickey late December 2021 - K. Hickey Dep. Ex. 16
93	Screenshots of Toya texts to Hickey - K. Hickey Dep. Ex. 17
94	Rafael Lenz LinkedIn Profile - Lenz Dep. Ex. 1
95	Email with Civil Cover Sheet 9/9/21 - Lenz Dep. Ex. 2
96	Email Re: Property Incident Report 7/21/21 - Lenz Dep. Ex. 3
97	Email with attached TPI's responses to the plaintiff's requests for prod of docs - Lenz Dep. Ex. 4
98	Email with attached TPI's answers to the plaintiffs' interrogatories - Lenz Dep. Ex. 5
99	Stites & Harbison PLLC emails to Aaron - Lenz Dep. Ex. 6
100	The Partnership, Inc.'s First Amended Answers to Plaintiff's First Set of Interrogatories - Lenz Dep. Ex. 7
101	Email to Erik and Jomel; Re: Seven Courts Payables 10/7/21 - Lenz Dep. Ex. 8
102	Lenz Dep. Ex. 9
103	Apartment Lease Contract - Lenz Dep. Ex. 10
104	Email with Affirmative Fair Housing Marketing Plan attached - AFHMP - Lenz Dep. Ex. 11
105	Email Re: Property Incident Report 09/11/18 - Lenz Dep. Ex. 12
106	Email Re: Property Incident Report 10/24/18 - Lenz Dep. Ex. 13
107	Email Re: Property Incident Report 04/19/19 - Lenz Dep. Ex. 14
108	Email from Amara Hubbard 6/28/19 - Lenz Dep. Ex. 15

109	Email from Toya with forwarded complaint 05/16/20 - Lenz Dep. Ex. 16
110	Lenz Dep. Ex. 17
111	Email from Holt Re: Report from 08/03/20 - Lenz Dep. Ex. 18
112	Emails from Holt Re: Reports 08/04/2020 - Lenz Dep. Ex. 19
113	Email from Holt Re: Report from 08/20/20 - Lenz Dep. Ex. 20
114	Email from Holt Re: Report from 09/05/20 - Lenz Dep. Ex. 21
115	Texts with Horace/ Holt Security - Lenz Dep. Ex. 22
116	Emails with Barbara - Lenz Dep. Ex. 23
117	Holt Security LLC Agreement - Horace Holt Dep. Ex. 1
118	06/04/2019 Police Incident Report - Horace Holt Dep. Ex. 2
119	06/18/2019 Email from Holt re: Daily Report - Horace Holt Dep. Ex. 3
120	06/22/2019 Email from Holt re: Daily Report - Horace Holt Dep. Ex. 4
121	12/31/2019 Email from Holt re: Drug Report and Invoice - Horace Holt Dep. Ex. 5
122	10/17/2019 Police Report - Horace Holt Dep. Ex. 6
123	12/28/2019 Email from Holt re: Drugs and shooting - Horace Holt Dep. Ex. 7
124	Email 03/10/2020 - Horace Holt Dep. Ex. 8
125	03/23/2020 Email from Toya re: Report - Horace Holt Dep. Ex. 9
126	04/05/2020 Email from Holt re: Daily Report - Horace Holt Dep. Ex. 10
127	04/18/2020 Email from Holt re: Daily Report - Horace Holt Dep. Ex. 11
128	06/08/2020 Emails - Horace Holt Dep. Ex. 12
129	07/29/2020 Email - Horace Holt Dep. Ex. 13
130	06/29/2020 Email from Holt re: Daily Report - Horace Holt Dep. Ex. 14
131	07/26/2020 Email - Horace Holt Dep. Ex. 15
132	07/29/2020 Email from Holt re: Police Incident Report re: John Hayes - Horace Holt Dep. Ex. 16
133	08/02/2020 Incident Report - Horace Holt Dep. Ex. 17
134	08/03/2020 Email from Holt re: false crime report - Horace Holt Dep. Ex. 18
135	08/03/2020 Email from Holt re: Daily Report - Horace Holt Dep. Ex. 19

136	08/03/2020 Email from Holt re: Break-in report and increased presence request - Horace Holt Dep. Ex. 20
137	08/05/2020 Email from Holt re: Police Incident Report from 08/03/2020 - Horace Holt Dep. Ex. 21
138	08/09/2020 Email from Holt re: Daily Report - Horace Holt Dep. Ex. 22
139	09/04/2020 Email from Holt re: Incident Report - Horace Holt Dep. Ex. 23
140	09/07/2020 Email from Holt re: Incident Report - Horace Holt Dep. Ex. 24
141	09/12/2020 Email from Holt re: Daily Report - Horace Holt Dep. Ex. 25
142	09/17/2020 Email from Holt re: Incident Report - Horace Holt Dep. Ex. 26
143	09/24/2020 Email from Holt re: Incident Report - Horace Holt Dep. Ex. 27
144	10/13/2020 Police Incident Report - Horace Holt Dep. Ex. 28
145	09/12/2020 Incident Report - Horace Holt Dep. Ex. 29
146	12/08/2021 Email from E. Oglesby to Holt re: Recap of Discussion - Horace Holt Dep. Ex. 30
147	Declaration of Horace Holt - Horace Holt Dep. Ex. 31
148	Email change with E. Oglesby re: Subpoena - Horace Holt Dep. Ex. 32
149	02/13/2022 Email from Holt re: Police Incident Report - Horace Holt Dep. Ex. 33
150	09/28/2021 Email from Wynn re: Lighting Report - Horace Holt Dep. Ex. 34
151	Email Chain with Aaron Block and Jeffrey Melcher re: Holt - Horace Holt Dep. Ex. 35
152	12/22/2021 Email from Holt to Block Firm re: Retaliation - Horace Holt Dep. Ex. 36
153	12/26/2021 Email from Holt to E. Oglesby re: Retaliation - Horace Holt Dep. Ex. 37
154	12/27/2021 Email from A. Block to J. Melcher re: Holt Payment - Horace Holt Dep. Ex. 38
155	01/06/2022 Email from E. Oglesby to A. Block and M. Marks re: Holt Retaliation - Horace Holt Dep. Ex. 39

156	02/13/2022 Email from Holt re: Security document and statement - Horace Holt Dep. Ex. 40
157	02/21/2022 Email from Wynn re: Termination Notice - Horace Holt Dep. Ex. 41
158	TPI Employment Application for McLester Tacharmne Latoya Wynn - Wynn Dep. Ex. 1
159	Job Description - Wynn Dep. Ex. 2
160	General Handbook Acknowledgement - Wynn Dep. Ex. 3
161	Transcript for Tacharmne Wynn - Wynn Dep. Ex. 4
162	07/02/2020 Email - Wynn Dep. Ex. 5
163	04/18/20 Email from Holt to Harris re: Report - Wynn Dep. Ex. 6
164	03/10/20 Email from Holt to Harris re: Report - Wynn Dep. Ex. 7
165	03/31/20 Email from Harris to Bonnie Gayner and Latoya Wynn re: Report - Wynn Dep. Ex. 8
166	Email from Latoya Wynn to Harris with EyeQ Monitoring Seven Courts Proposal attached - Wynn Dep. Ex. 9
167	04/15/21 EyeQ Monitoring Statement of Work - Wynn Dep. Ex. 10
168	The Partnership, Inc.'s First Amended Answers to Plaintiff's First Set of Interrogatories; Seven Courts Community Rules & Regulations - Wynn Dep. Ex. 11
169	Mid-Month Checklist Seven Courts 05/17/20 - Wynn Dep. Ex. 12
170	Apartment Lease Contract 11/1/19 - Wynn Dep. Ex. 13
171	Resident Ledger 10/19/21 - Wynn Dep. Ex. 14
172	10/1/20 TPI Notice to Cancel Holt Security Services - Wynn Dep. Ex. 15
173	8/17/21 Email from Latoya Wynn to E. Zamora, R. Harris, and J. Etienne re: B23 reverse write off - Wynn Dep. Ex. 16
174	Email with Financials for July 2021 attached - Zamora Dep. Ex. 1
176	Email to Rodrick stating no cash available to pay Holt as of 12/21 - Zamora Dep. Ex. 3
177	Jacobs Response - Bruce Jacobs Dep. Ex. 1
178	Handwritten Notes - Bruce Jacobs Dep. Ex. 2
179	Police Report - Bruce Jacobs Dep. Ex. 3
180	Defendants Expert Report - Bruce Jacobs Dep. Ex. 4
181	Bruce Jacobs Perez Case Affidavit - Bruce Jacobs Dep. Ex. 5
182	Photographs - Elsa Diaz Dep. Ex. 1
183	Report of Anique Whitmore, LPC

184	911 Audio Recording
185	Documents detailing corporate organizational structure of Seven Courts Partners, L.P.
186	Deed of Seven Courts Apartments real property
187	Plaintiffs' Responses to TPI's Requests for Admissions
188	TPI's Responses to Plaintiffs' Requests for Admissions
189	Plaintiffs' Answers to TPI's Interrogatories
190	TPI's Answers to Plaintiffs' Interrogatories
191	Plaintiffs' Initial Disclosures
192	TPI's Initial Disclosures
193	Plaintiffs' Responses to TPI's Requests for Production
194	TPI's Responses to Plaintiffs' Requests for Production

Respectfully submitted this 7th day of June, 2023.

/s/ Jeffrey W. Melcher
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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), undersigned counsel certifies that the foregoing was prepared in Times New Roman, 14 point font, in compliance with Local Rule 5.1(C).

/s/ Jeffrey W. Melcher
Georgia Bar No. 501180
Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 7th day of June, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system.

By: /s/ Jeffrey W. Melcher
Georgia Bar No. 501180

PLAINTIFFS' OBJECTIONS TO DEFENDANT'S EXHIBITS

Exhibit Number	Description	Plaintiffs' Objections
177	Jacobs Response - Bruce Jacobs Dep. Ex. 1	Hearsay; may be used as a party admission
178	Handwritten Notes - Bruce Jacobs Dep. Ex. 2	Hearsay; may be used as a party admission
180	Defendants Expert Report - Bruce Jacobs Dep. Ex. 4	Hearsay; may be used as a party admission
186	Deed of Seven Courts Apartments real property	TPI has not identified where this document was produced during discovery; Irrelevant
188	TPI's Responses to Plaintiffs' Requests for Admissions	Does not exist: Plaintiffs did not serve requests for admission on TPI
190	TPI's Answers to Plaintiffs' Interrogatories	Hearsay; may be used as a party admission
192	TPI's Initial Disclosures	Hearsay; may be used as a party admission
194	TPI's Responses to Plaintiffs' Requests for Production	Hearsay; may be used as a party admission